

# OFFICES OF FREDERICK P. HAFETZ LLC

ATTORNEYS AT LAW

---

420 LEXINGTON AVENUE #2818  
NEW YORK, N.Y. 10170  
TELEPHONE: (212) 997-7400  
TELECOPIER. (212) 997-7646

September 29, 2023

**VIA ECF**

Hon. Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: United States v. Gulkarov et al.  
22-CR-00020 (PGG)

Dear Judge Gardephe:

I write with the consent of the government and Pretrial Services to respectfully request a modification of the terms of Mr. Gulkarov's bail conditions.

The terms of Mr. Gulkarov's pre-trial release require, *inter alia*, that he have no contact with his co-defendants outside of the presence of counsel. (Dkt. No. 57). However, yesterday, Mr. Gulkarov signed a plea agreement with the government, and the government has now agreed that Mr. Gulkarov may be allowed to fraternize with his co-defendant Roman Israilov subject to the condition that they not discuss the case pending against them outside the presence of counsel.

Accordingly, we respectfully request that Mr. Gulkarov's bail conditions be modified to allow him to fraternize with Roman Israilov, subject to the requirement that they not discuss the case against them outside of the presence of counsel and with all other bail conditions remaining unchanged. Pretrial Services does not object to this request.

If the Court consents to this bail modification application, I respectfully request that Your Honor "So Order" this letter.

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

Paul G. Gardephe

**Paul G. Gardephe, U.S.D.J.**

Date: October 3, 2023

cc: All counsel (via ECF)

s/ Noah E. Shelanski